

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO.:23-24670-CIV-LENARD/DAMIAN

SHANTEE REESE,

Plaintiff,

v.

ALORICA INC.,  
a Foreign Profit Corporation,

Defendant.

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**DEFENDANT’S *UNOPPOSED* MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

Defendant, Alorica Inc. (“Defendant”), by and through their undersigned counsel, hereby moves, on an unopposed basis, for an additional 6-day extension of time to respond to Plaintiff’s Complaint, up to and including, Monday, January 22, 2024. In support, Defendant states as follows:

1. On November 02, 2023, Plaintiff, Shantee Reese (“Plaintiff”) filed the operative Complaint alleging claims under the Florida Civil Rights Act of 1992 (“FCRA”) and the Miami-Dade County Human Rights Ordinance (“MDHRO”).
2. Defendant retained undersigned counsel and Jackson Lewis, P.C. to represent it in connection with this case, and removed the instant case to this Court.
3. Counsel for the parties have made some progress towards an early resolution of this matter and wish to continue to explore the possibility this matter could resolve without a response to the Complaint having to be filed.
4. In light of the above, Defendant requests that the Court grant Defendant six (6) additional days to respond to the Complaint up to including, Monday, January 22, 2024.

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5. Undersigned counsel conferred with Plaintiff's counsel regarding this request for an extension and Plaintiff's counsel **does not oppose** this request.

6. This Motion is made in good faith and not for purposes of delay. Moreover, no party will be prejudiced by the granting of this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's unopposed request for a 6-day extension of time, up to and including Monday, January 22, 2024, in which to file their response to Plaintiff's Complaint.

Dated: January 16, 2024

Respectfully submitted,

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/s/ Dion Cassata  
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*Counsel for Defendant*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 16, 2024, a true and correct copy of the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record.

s/ Dion J. Cassata  
Dion J. Cassata, Esq.

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